

# EXHIBIT E

11:24

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

RAYMOND ALBERT RODRIGUEZ )  
PLAINTIFF, )

vs. ) CASE NO. 4:14-CV-00968

11:24

ELI LILLY AND COMPANY; LILLY )  
USA, LLC; AND JULIA DAWN )  
RAMOS )  
DEFENDANTS. )

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11:24

ORAL DEPOSITION OF

JULIA RAMOS

February 6, 2015

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11:24

ORAL DEPOSITION OF JULIA RAMOS, produced as a  
witness at the instance of the Plaintiff and duly sworn,  
was taken in the above-styled and numbered cause on the  
6th day of February, 2015, from 12:12 p.m. to 1:05 p.m.,  
before Cindi L. Bench, Certified Shorthand Reporter in  
and for the State of Texas, reported by computerized  
stenotype machine at the offices of JACKSON WALKER, LLP,  
1401 MCKINNEY, SUITE 1900, HOUSTON, TEXAS pursuant to  
the Federal Rules of Civil Procedure and the provisions  
stated on the record or attached hereto.

11:24

12:13 1 period?

2 A. Yes.

3 Q. What was his position with Eli Lilly during  
4 this time?

12:13 5 A. Primary care sales rep in Pasadena.

6 Q. Can we agree to have that abbreviated to rep?

7 A. Absolutely.

8 Q. Have you been in a deposition before, ma'am?

9 A. Nope.

12:14 10 Q. You understand that you took an oath, and that  
11 you have an obligation to tell the truth?

12 A. I do.

13 Q. Is that your intention today?

14 A. Yes.

12:14 15 Q. All right. Is there any reason that you would  
16 be impaired from telling the truth today?

17 A. No.

18 Q. Okay. So what did Mr. Rodriguez do? What  
19 were his duties at Eli Lilly during this time period

12:14 20 that he reported to you?

21 A. He was the sales representative that called on  
22 diabetes customers, and his job was to sell our  
23 products, Tradjenta and Humalog.

24 Q. And did he also have insulin as part of his --

12:14 25 A. Yes.